PORT OF HOUSTON AUTHORITY

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March 2, 2011

Mr. Stephen Tzhone
Mr. Valmichael Leos
Project Managers, San Jacinto River Waste Pits Superfund Site
1445 Ross Avenue, Suite 1200
Mail Code: 6SF-RA
Dallas, TX 75202-2733

Re: San Jacinto River Waste Pits Superfund Site-Comments to Time Critical Removal Action Documents

Dear Messrs. Tzhone and Leos:

Enclosed are the Port of Houston Authority's comments on the Time Critical Removal Action Documents for the San Jacinto Waste Pits Superfund Site. We would appreciate your review and consideration of these comments. If you have any questions, please contact me at 713-670-2663.

Very truly yours,

Linda Henry

Linda Henry

Enclosure

C: Nicole Hausler (PHA)

February 25, 2011

Re: Port of Houston Authority's Comments on Time Critical Removal Action Documents
San Jacinto Waste Pits Superfund Site

On behalf of the Port of Houston Authority ("PHA"), HDR submits the following comments to the Time Critical Removal Action ("TCRA") in connection with the San Jacinto Waste Pits Superfund Site ("Site"). In addition to commenting on the TCRA, the PHA requests that these same issues be evaluated as part of the Remedial Investigation/Feasibility Study (RI/FS) efforts as well.

Two issues have been identified at this time that should be more fully considered in the development of the TCRA Alternatives and require emphasis in development of final remedial alternatives:

1. Geo-textile vs. geo-membrane. There are positive and negative aspects to each of these materials that should be considered for the TCRA and in the RI/FS. Geo-textiles may contain the solid material but dioxins can diffuse through the fabric and may continue to contaminate the surrounding area. Geo-membranes are impermeable, and while they should contain the contaminated material, a potential issue in using geo-membranes at a site with high organic content is the development of methane and hydrogen sulfide gas. The gases form bubbles beneath the membrane that can compromise the entire cap. If a geo-membrane would be used, a gas diffuse system would need to be incorporated into the cap.

2. There is no evidence that the TCRA alternatives analysis considered ship wakes, waves caused by tropical storms, subsidence, soil conditions, or sea-level rise. Although it is understood that the TCRA is meant to be temporary to allow the contamination to be contained while the site is characterized and long-term remediation plans are developed, the TCRA is discussed in terms of 5 to 7 years. Wave action, ship wakes, and subsidence have the potential to compromise the TCRA Alternatives, even during a 5-7 year time horizon. In addition, the documentation of the contaminants includes a discussion of solid and liquid waste; however, the TCRA appears to consider only the containment of solid materials, which could result in a (liquid) density plume moving away from the site.

In addition to the TCRA Alternatives, there are several threshold issues that should be considered as the scope of work for the RI/FS is developed, including:

- Current and future operations near the site
- Baseline condition for remediation

- Fingerprinting of dioxins
- Analysis of sediment transport
- Water column modeling
- Future land use of the Superfund site

Additional issues may be identified as the scope of the RI/FS is developed, and the PHA will continue to provide input as the process moves forward. In the interim, however, these initial comments should be considered in connection with the TCRA and in conjunction with development of the RI/FS.

Any questions regarding HDR's comments on behalf of the PHA should be directed to Linda Henry at (713) 670-2663.

Kerri Snyder

Kerri Snyder, AICP
Project Manager